

Department of Industrial Relations
Division of Occupational Safety and Health
ELEVATOR UNIT HQS
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January 18, 2019

CIRCULAR LETTER E-19-01

**TO: Installers and Manufacturers of Conveyances and Related Equipment
and Other Interested Parties**

**SUBJECT: Electrical Conduit and Pipe Installation between Elevator Hoistways
and Machine Rooms or Control Rooms**

This circular states the Division's policy regarding the installation of electrical conduit and pipe between elevator hoistways and machine rooms or control rooms.

These conduit and pipe runs have historically been installed by elevator professionals as part of a contract to install the elevator system in a building. California Labor Code sections 7300.2, 7311.1, and 7311.2 were enacted by the Legislature at the request of the elevator industry in 2002 in order to ensure that only certified, qualified workers install elevator systems in California buildings and to promote the safety of workers and of the riding public. As the Division continues to receive reports that this work is being carried out by workers who are not certified by the Division, it is important to issue this circular to clarify the policy.

California Labor Code sections 7300.2, 7311.1, and 7311.2 state in part:

7300.2 . . . this chapter [Labor Code sections 7300–7324.2] covers the design, erection, construction, [and] installation . . . of . . . conveyances and their associated parts and hoistways: . . .

7311(a) . . . no conveyance subject to this chapter shall be erected, constructed, installed, materially altered, tested, maintained, repaired, or serviced by any person, firm, or corporation unless the person, firm, or corporation is certified by the division as a certified qualified conveyance company.

7312(a) . . . any person who, without supervision, erects, constructs, installs, alters, tests, maintains, services or repairs, removes, or dismantles any conveyance covered by this chapter, shall be certified as a certified competent conveyance mechanic by the division.

These Labor Code sections require that the installation of conveyances — and their associated parts — be performed under the supervision of certified competent conveyance mechanics who are employed by certified qualified conveyance companies. The Division considers a conduit run between the hoistway and the elevator machine room or control room to be part of an elevator installation if it contains or will contain elevator wiring, fluids, or equipment. Therefore, this conduit run must be installed by, or under the supervision of, a certified competent conveyance mechanic.

The Division's long-standing position on this conduit run is consistent with the California Labor Code and historic norms in the elevator industry.

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The Division will continue to work with elevator contractors and others to assure that this conduit installation is not the subject of ongoing confusion.

A handwritten signature in black ink, appearing to read "Debra Tudor". The script is cursive and fluid, with the first name "Debra" and last name "Tudor" clearly distinguishable.

Debra Tudor
Principal Engineer
DOSH-Elevator Unit HQS